

Joseph Lavi, Esq. (State Bar No. 209776)  
jlavi@lelawfirm.com  
Jordan D. Bello, Esq. (State Bar No. 243190)  
jbello@lelawfirm.com  
**LAVI & EBRAHIMIAN, LLP**  
8889 W. Olympic Blvd., Suite 200  
Beverly Hills, California 90211  
Telephone: (310) 432-0000  
Facsimile: (310) 432-0001

Sahag Majarian II, Esq. (State Bar No. 146621)  
sahagii@aol.com  
**Law Offices of Sahag Majarian II**  
18250 Ventura Boulevard  
Tarzana, California 91356  
Telephone: (818) 609-0807  
Facsimile: (818) 609-0892

Attorneys for PLAINTIFF  
ERNEST CUADRA on behalf of himself and others  
similarly situated.

*Counsel information continues in next page*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

ERNEST CUADRA on behalf of himself and  
others similarly situated.

PLAINTIFF,

vs.

FEDEX GROUND PACKAGE SYSTEM, INC.,  
et al.,

DEFENDANTS.

Case No.: 3:20-cv-02089-RS

**JOINT REPORT RE DISCUSSING  
PROSPECT OF CASE RESOLUTION**

Before Hon. Richard Seeborg, United States  
District Judge

1 EVAN R. MOSES, CA Bar No. 198099

2 evan.moses@ogletree.com

3 ALEXANDER M. CHEMERS, CA Bar No. 263726

4 alexander.chemers@ogletree.com

5 MELIS ATALAY, CA Bar No. 301373

6 melis.atalay@ogletree.com

7 OGLETREE, DEAKINS, NASH,

8 SMOAK & STEWART, P.C.

9 400 South Hope Street, Suite 1200

10 Los Angeles, CA 90071

11 Telephone: 213-239-9800

12 Facsimile: 213-239-9045

13 Attorneys for Defendant

14 FEDEX GROUND PACKAGE SYSTEM, INC.

1 Pursuant to the Court's Order instructing all civil litigants to engage in an additional meet and  
2 confer to discuss the possibility of settlement, the parties submit this joint report. (ECF No. 16.) The  
3 parties engaged in a meet and confer on June 4, 2020 to discuss the possibility of settlement. The  
4 result of the meet and confer was as follows:

5 \_\_\_\_ The case settled, and the parties will submit a filing to this effect within the next 30 days.

6 \_\_\_\_ Although the case did not settle, the parties made meaningful progress toward settlement  
7 and therefore request the opportunity to engage in additional ADR. Specifically, the parties  
8 request the following:

9 √ Despite a good-faith effort to reach a settlement at the meet and confer, the case did not  
10 settle.

11  
12  
13 Dated: June 17, 2020

**LAVI & EBRAHIMIAN, LLP**

14  
15 By: /s/ Jordan D. Bello  
16 Joseph Lavi, Esq.  
17 Jordan D. Bello, Esq.  
Attorneys for PLAINTIFF  
ERNEST CUADRA

18 Dated: June 17, 2020

**OGLETREE, DEAKINS, NASH, SMOAK &  
STEWART, P.C.**

19  
20  
21 By: /s/ Melis Atalay  
22 Evan R. Moses, Esq.  
23 Alexander M. Chemers, Esq.  
24 Melis Atalay, Esq.  
Attorneys for DEFENDANT  
FEDEX GROUND PACKAGE SYSTEM,  
INC.

25 43171167.1  
26  
27  
28